

Court
CopyUnited States District Court
for the Middle District of PennsylvaniaWm. Branch
Plaintiff: civil action No. 1:00 CV-00-1728
: (Judge Conner)vs.
Mr. Russian
DefendantFILED
HARRISBURG, PABrief in Support of Motion for
Discovery or to Compel Discovery

JAN 23 2004

MARY E. D'ANDREA, CL
Per
Deputy Clerk

if it Please's the Court inmate William Branch CF3756
 humbly Prays this august TRIBunal, will Grant this motion
 To allow Discovery or Compel the Defendants to provide me
 with information in their possession, Per Fed. Rules of
 Civil Procedure 26 (A) 33 (a)(b)(3) these Rules call for the
 Defendants to Cooperate with me in Discovery, Judge Rambo
 Set 30 days to complete Discovery Per Docket Sheet #64 entered
 1-15-02, but to this day Defense has not cooperated NOR
 Objected to my motion for Discovery, I Recieved one Letter
 from Sean ~~Say~~ at D.O.C. but no answer in OVER 2 yrs
 It is impermissible to Grant Summary Judgement when there
 exist meritorious issue's Fed Rules Civil Procedure 56(f).

The defendants argue the C/o Russian was only doing his
 duty but he does not state that I had wrote Request to Staff PRIOR
 to his issuing a misconduct on me, the Request complained about
 his abuse of said Safety and Security checks I also wrote a
 grievance about said checks which Staff never answered

MS. SURACE STATES she never Retaliated against
 me a close check of misconducts written by her on me
 will reveal Two misconducts ~~were~~ issued # 295142 Dated
 10-10-97 and # 990495 Dated 9-25-97 Both were up held

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 The allowance of Discovery or to compel
 Discovery

I was found Guilty and Removed from my Job. on misconduct 990495 I had asked Mr Friedman
 Mr Long and Ms Surace for Time off because I had a court date in Dist. court w/Judge Rambo first they
 refused and I pressed the issue. So they agreed at the end of the 30 days all this happen. Ms Surace
 Retaliated against me and on the misconduct stated that she ordered me not to go to the law library, Capt Gavin
 okayed this misconduct, Hearing Examiner Welby lied on the Guilty Plea, I never pleaded Guilty. No Due
 Process. With each one of these defendants they have misstated what actually accurred. I have been
 physically attacked by staff without any provocation from me in fact the officer denied that anything happen
 I reported the attack and was put in the hold for 90 days. Now these Doc. Employee's look out for each other
 do you believe I received a fair investigation at their hands, Their attitude is "What are you a niger lover!"

Respectfully I ask this Just Tribune to grant
 this motion for Discovery or to compel Discovery

Proof of Service

MS Mosley esq
 Strawberry Sq 15FL
 Harrisburg Pa 17120

I affirm under penalty of the law that the above is true.
unsworn Declaration

Date 1-16-04

William Branch CF3756
 P.O. Box 256
 Waymart Pa 18472